

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 97 of the Commission's)	
Amateur Radio Service Rules to Eliminate)	RM – 10786
Morse Code Proficiency Testing Requirements)	
For All Classes of Amateur Licenses)	
)	
To: The Commission)	

Comments from Christopher E. Morrill, N1ZWB & Kathleen Blake, N1ZYI

I am writing to support the proposal to drop the Morse Code requirement for all of the Amateur Radio classes as soon as possible. Times and technology have changed dramatically over the years, and all of the previously claimed reasons for requiring Morse proficiency of all amateur radio operators have disappeared. Virtually no government in the world today or commercial radio service uses Morse telegraphy. Thus, the historical need of the government, commercial, and maritime services for a “pool of (Morse) trained operators” has ceased to exist.

The maintenance of morse proficiency tests as a requirement for any amateur radio license is no longer in accord with the purpose of the amateur radio Service and serves no legitimate regulatory purpose. In fact it serves as a detriment to attracting new members to the amateur radio service today.

Even the IARU recognizes that continuing Morse proficiency requirements is not in the best interest of the future of the amateur radio service. Other administrations (Switzerland, the United Kingdom, Belgium, Germany, The Netherlands, and Norway) have already eliminated Morse test requirements and many more are expected to follow suit rapidly.

It is not in the public interest for the Commission to impose more onerous and unnecessary burdens on those seeking a Commission-issued amateur radio license than would be faced by equally qualified individuals in other countries, as this will unnecessarily limit the pool of operators available for emergency communications.

The Commission's own determinations, as well as a significant body of public comment, from the Proceedings in both 1990 and 1999, as referenced in the NCI Petition, clearly demonstrate that a Morse proficiency test requirement is unnecessary and undesirable, in that:

- It does not comport with the basis and purpose of the Amateur Radio Service.
- It acts as a barrier to entry or advancement to otherwise qualified persons.
- It is not necessarily indicative of an individual's ability to contribute to the advancement of the radio art.
- It does not provide any indication of the examinee's good character, high intelligence, cooperative demeanor, or willingness to comply with the Commission's rules.
- It no longer continues to serve a regulatory purpose.
- It otherwise does not serve the public interest and necessity.

The Commission has the authority to amend its Part 97 rules to eliminate Morse proficiency requirements by expedited order, without formal notice and public input. This course would be a wise, correct, and prudent decision on the Commission's part. In addition, the Commission should refrain from combining NCI's request for the prompt elimination of Morse test requirements from its rules with other substantially unrelated issues such as, but not limited to, band segmentation, changes in the number of license classes, sweeping changes in operator privileges by license class, etc., because that would result in unnecessary, protracted delay in resolving this important and clear-cut issue.

In summary, for all of the reasons outlined and referenced herein, the Commission should eliminate the "Element 1" Morse test totally from the Commission's rules for all license classes.

Respectfully submitted,

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